

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

CHITALU CHITALU, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

CASAD COMPANY, INC., d/b/a TOTALLY  
PROMOTIONAL

Defendant.

Case No. 3:24-cv-01975-JZ

**MOTION FOR ADMISSION PRO HAC VICE OF LEIGH S. MONTGOMERY**

Pursuant to Rule 83.5(h) of the Local Civil Rules of the United States District Court for the Northern District of Ohio, Joshua Sanford, counsel of record for Plaintiff, Chitalu Chitalu ("Plaintiff"), hereby moves the Court to admit Attorney Leigh S. Montgomery *pro hac vice* to appear and participate as additional counsel of records in this case for Plaintiff.

Movant represents that Attorney Montgomery is a member in good standing of the highest court of Texas, and that this Motion is accompanied by the required \$120.00 fee. Attorney Montgomery will promptly register for electronic filing with this Court upon the granting of this Motion.

A declaration from Attorney Montgomery in support of this Motion is attached.

Respectfully submitted,

Dated: January 07, 2025

/s/ Joshua Sanford

Joshua Sanford (AR Bar ID # 2001037)  
**EKSM, LLP**  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Phone: (501) 221-0088  
Fax: (888) 787-2040  
jsanford@eksm.com

***Counsel for Plaintiff***

**CERTIFICATE OF SERVICE**

I hereby certify that on January 07, 2025, a copy of this Motion for Admission Pro Hac Vice of Leigh S. Montgomery was filed electronically and served on all counsel of record through the electronic filing system.

/s/ Joshua Sanford

Joshua Sanford (AR Bar ID # 2001037)

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***Counsel for Plaintiff***

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**DECLARATION IN SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE OF LEIGH S. MONTGOMERY**

I, Leigh S. Montgomery, an attorney seeking to represent Plaintiff, Chitalu Chitalu in the above-captioned matter, hereby declare as follows:

1. I make this declaration based upon my own personal knowledge;
2. I seek admission *pro hac vice* in the above-referenced matter;
3. I hereby attest that I am a member in good standing of the highest court of the State of Texas. I was admitted to the Texas bar in 2008.
4. I hereby provide the information required by Rule 83.5(h) of the Local Rules for the United States District Court of the Northern District of Ohio:

a. Leigh S. Montgomery  
**EKSM, LLP**  
4200 Montrose Blvd  
Suite 200  
Houston, Texas 77006  
Phone: (888) 350-3931  
Fax: (888) 276-3455

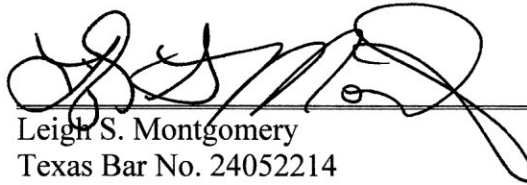
- b. I was admitted to practice before the Supreme Court of Texas on May 2, 2008, and my Texas Bar No. is 24052214. A true and correct copy of a Certificate in Good Standing from the Supreme Court of Texas is attached hereto.

I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any State or the United States.

- d I have never received a reprimand from any court, department, bureau, or commission of any State or the United States pertaining to conduct or fitness as a member of the bar.

I declare under penalty of perjury under laws of the United States that the foregoing is true and correct.

Executed this 07<sup>th</sup> day of January 2025 in Houston, Texas.

A handwritten signature in black ink, appearing to read 'Leigh S. Montgomery', is written over a horizontal line.

Leigh S. Montgomery  
Texas Bar No. 24052214

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